

Issuance Date: December 18, 1998
Effective Date: December 30, 1998
Expiration Date: December 30, 2003

AIR OPERATING PERMIT No. 000369-7

(Filename BCW_1198.doc)

In compliance with the provisions of The State of Washington
Clean Air Act Chapter 70.94 Revised Code of Washington

**Boise Cascade Corporation
Wallula, Washington**

is authorized to operate in accordance
with the terms and conditions
of this permit.

Issued by:

State of Washington
DEPARTMENT OF ECOLOGY
300 Desmond Drive
P.O. Box 47600
Olympia, Washington 98504-7600

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INTRODUCTION AND LEGAL AUTHORITY

This Air Operating Permit is authorized under the Operating Permit Regulation, Chapter 173-401 WAC. The provisions of this permit describe the emissions limitations, operating requirements, monitoring and recordkeeping requirements, and reporting frequencies for the permitted source.

Boise Cascade Corporation, Wallula Mill (Boise Cascade) requires a Title V Air Operating Permit because it emits or has the potential to emit, one hundred tons per year or more of one or more air pollutants. [WAC 173-401-300(1).]

During the drafting of this permit, Ecology has attempted to incorporate requirements using the exact language of the law, regulation or order. Where there is a difference in language, this difference is presented in this permit only for clarification of the underlying requirement. The legal requirement remains the underlying requirement. Any conflict between the permit and an underlying requirement that is not acknowledged in this permit or its Support Document, nor is addressed in past orders or permits referenced in this permit or its Support Document, will be resolved by referring to the underlying requirement. Unless otherwise stated, the effective date of referenced regulations or statutes is that of the provision in effect on the date of permit issuance. Compliance with underlying requirements shall be demonstrated using the methods specified in this permit or the Support Document.

The Title V Air Operating Permit consists of all parts of this assembled document including its Footnotes and Appendices, but does not include the accompanying Support Document, nor the Title V permit application materials submitted by Boise Cascade nor any other past orders or permits.

The definition of terms contained in WAC 173-401-200, and as defined in all referenced regulations, apply to this permit unless otherwise defined in the permit.

EMISSION UNIT SPECIFIC REQUIREMENTS [WAC 173-401-600]

Section I contains requirements applicable to described units, prior to startup of the No. 3 Recovery Furnace with tri-level air equipment. Section II contains requirements applicable to described units, only upon startup of the No. 3 Recovery Furnace with tri-level air equipment. Emissions units addressed in Sections I and II are subject to either Section I or Section II, but not both. General requirements that apply to monitoring, recordkeeping and reporting for these limits that are in the Facility-Wide General Requirements section of this permit. Monitoring and reporting requirements that are specific to each limit are listed in the emission unit specific tables, and should be read in conjunction with the general requirements. The most restrictive limit is identified in Sections I and II. Refer to Appendix E of the permit for a comparison of multiple applicable requirements for a given emission unit. Unless specified otherwise, the basis of authority for the type and frequency of monitoring imposed in Section I or II is WAC 173-401-615.

Refer to Appendix C for emission estimate algorithms. These algorithms set forth the calculation method for those emission limits that the required Reference Method itself does not yield a direct emission measurement. The Permittee may use an equivalent method with written approval from Ecology.

I. Operating Scenario 1: Prior to Startup of No. 3 Recovery Furnace Tri-Level Air Equipment

A. No. 2 Recovery Furnace

Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
I.A.1	0.044 gr./dscf @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition I.A.7 for minimum O&M requirements intended to indicate compliance with the particulate limit.	40 CFR 60.282(a)(1)(i)
I.A.2	476 lbs./day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report test results in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQ1078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.A.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. If the total number of contiguous periods of excess emissions in a quarter is less than six percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement. The Permittee shall comply with Condition I.A.7 for opacity monitoring and reporting requirements.	40 CFR 60.11(b) 40 CFR 60.13(h) 40 CFR 60.282(a)(1)(ii) for opacity standard, 40 CFR 60.284(e)(1)(ii) WAC 173-405-040(6)
I.A.4	SO ₂	500 ppm @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using DOE Method 6 or a test method approved in writing by Ecology . Report test results in the monthly report ² . The permittee shall monitor mill white liquor sulfidity as a performance indicator. If the mill white liquor sulfidity exceeds 33%, based on a 24-hour average, calculated daily, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of the permit. Report corrective actions in the monthly report.	WAC 173-405-040(11)(a)
I.A.5		5424 lbs./day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report excursions in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
I.A.6	TRS	5 ppmvd @ 8% O ₂ , 12-hour average.	Monitor continuously using DOE Method 12. Report excursions in the monthly report. If the total number of contiguous periods of excess emissions in a quarter is less than one percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement.	40 CFR 60.283(a)(2), 40 CFR 60.284(e)(1)(i)

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.A.7	Operation	Minimum operating condition	Monitor opacity continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B and App. F, Perf. Spec. 1. The permittee shall operate the continuous opacity monitor as a performance indicator to show continuous operation of the pollution control device. If opacity exceeds 35 percent for more than 6 consecutive minutes in any 60 minute period, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report corrective actions and performance indicator deviations in the monthly report.	WAC 173-405-040(10)

¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no than 105 days between each quarterly test. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

B. No. 3 Recovery Furnace

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.B.1	Particulate	0.10 gr./dscf @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition I.B.4 for minimum O&M requirements intended to indicate compliance with the particulate limit.	WAC 173-405-040(1)(a)
I.B.2	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition I.B.4 for opacity and reporting requirements.	WAC 173-405-040(6)

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.B.3	SO ₂	500 ppmvd @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using DOE Method 6 or a test method approved in writing by Ecology. The permittee shall monitor mill white liquor sulfidity as a performance indicator. If the mill white liquor sulfidity exceeds 33%, based on a 24-hour average, calculated daily, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of the permit. Report corrective actions in the monthly report ² .	WAC 173-405-040(11)(a)
I.B.4	Operation	Minimum operating condition	Monitor opacity continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B and App. F, Perf. Spec. 1. The permittee shall operate the continuous opacity monitor as a performance indicator to show continuous operation of the pollution control device. If opacity exceeds 35 percent for more than 6 consecutive minutes in any 60 minute period, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report corrective actions and performance indicator deviations in the monthly report.	WAC 173-405-040(10)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

I.B.5	TRS	5 ppm @ 8% O ₂ , daily average.	Monitor continuously using DOE Method 12. Report daily average of test results in the monthly report.	WAC 173-405-040(1)(c)
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¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

C. Lime Kiln

Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
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	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.C.1	Particulate	0.12 gr./dscf @ 10% O ₂ when firing with fuel oil, 0.067 gr./dscf @ 10% O ₂ when firing with natural gas, hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology ² . Report test results in the monthly report ³ . The Permittee shall comply with Condition I.C.8 for O&M requirements intended to indicate compliance with the particulate limit.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078 for basis of particulate limit when firing with fuel oil, 40 CFR 60.282(a)(3)(i) for basis of particulate limit when firing with natural gas.
I.C.2		906 lbs./day when firing with fuel oil, 466 lbs./day when firing with natural gas, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results ² . Report results in the monthly report ³ .	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
I.C.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition I.C.8 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)
I.C.4	SO ₂	500 ppmvd @ 10% O ₂ , hourly average.	Sample consisting of one 1-hour test per quarter using DOE Method 6 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition I.C.8 for O&M requirements to indicate compliance with the SO ₂ limit.	WAC 173-405-040(11)(a)
I.C.5		5 ppmvd @ 10% O ₂ , rolling annual average.	Sample consisting of one 1-hour test per quarter using DOE Method 6 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition I.C.8 for O&M requirements intended to indicate compliance with the SO ₂ limit.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
I.C.6		19 lbs./day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report test results quarterly in the monthly report.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
I.C.7	TRS	8 ppmvd @ 10% O ₂ , 12-hour average.	Sample continuously using DOE Method 12. Report only excursions in the monthly report.	40 CFR 60.13(d)(1) 40 CFR 60.284(a)(2) 40 CFR 60.283(a)(5)

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.C.8	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 1000 gpm for greater than one hour, the permittee will within 24 hours initiate corrective action to bring the scrubber liquid flow to 1000 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average excursions and corrective action in the monthly report. Scrubber pressure drop shall be monitored.	WAC 173-405-040(10) 40 CFR 60.284(b)(2)(i)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

I.C.9	TRS	80 ppmvd @ 10% O ₂ for two consecutive hours.	Sample continuously using DOE Method 12. Report only excursions in the monthly report.	WAC 173-405-040(3)(b)
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¹ Monitoring is required only when emission unit is operating.

² Lime kiln particulate tests will be performed on the fuel being fired on the day of the scheduled test. Tests will not be scheduled for the purpose of testing the lime kiln while firing a particular fuel type.

³ If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

D. No. 2 Smelt Tank

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.D.1	Particulate	0.2 lbs./ton of black liquor solids (dry weight), hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition I.D.5 for O&M requirements intended to indicate compliance with the particulate limit.	40 CFR 60.282(a)(2), WAC 173-405-040(2)
I.D.2		71 lbs./day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report results in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQ1078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.D.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition I.D.5 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)
I.D.4	TRS	0.033 lbs./ton of black liquor solids as H ₂ S, annual average.	Sampling consists of one test per year using EPA Method 16A/6C bag sample or equivalent method approved in writing by Ecology. Report test results annually.	40 CFR 60.283(a)(4)
I.D.5	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 20 gpm for greater than one hour, the permittee will within 24 hours initiate corrective action to bring the scrubber liquid flow to 20 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average excursions and corrective action in the monthly report.	WAC 173-405-040(10)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

I.D.6	Damper position	None	Report only bypass periods.	DE 78-112 as consolidated in Order DE 96-AQI078
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¹ Monitoring is required only when emission unit is operating. Scrubber pressure drop shall be monitored per 40 CFR 60.284(b)(2)(i).

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

E. No. 3 Smelt Tank

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.E.1	Particulate	0.3 lbs./ton of black liquor solids, hourly average.	Sampling consists of one 1-hour test per month using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition I.E.3 for O&M requirements intended to indicate compliance with the particulate limit.	WAC 173-405-040(2)

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.E.2	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition I.E.3 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)
I.E.3	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 20 gpm for greater than one hour, the permittee will within 24 hours initiate corrective action to bring the scrubber liquid flow to 20 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average excursions and corrective action in the monthly report.	WAC 173-405-040(10)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

I.E.4	Damper position	None	Record the damper position. Report only bypass periods.	DE 78-112 as consolidated in Order DE 96-AQI078
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¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

F. Hog Fuel Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.F.1	Particulate	0.04 gr./dscf @ 12% CO ₂ , average of three 1-hour tests.	Sample quarterly consisting of three 1-hour tests using EPA Method 5 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition I.F.4 for O&M requirements intended to indicate compliance with the particulate limit.	PSD-X-77-04 as consolidated in Order DE 96-AQI078
I.F.2		459 lbs./day, rolling annual average.	Daily average value are calculated using actual emissions from previous stack test results. Report results quarterly.	PSD-X-77-04 as consolidated in Order DE 96-AQI078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.F.3	Opacity	Average 20% for more than 3 consecutive minutes in any 60 minute period, except for emissions due to soot blowing or grate cleaning for up to 15 minutes in 8 consecutive hours.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition I.F.4 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-400-070(2)(a) for basis of opacity limit.
I.F.4	Operation	Minimum operating condition	Monitor scrubber liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 800 gpm for greater than one hour, the permittee will within 24 hours initiate corrective action to bring the scrubber liquid flow to 800 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average excursions and corrective action in the monthly report.	WAC 173-405-040(10)

¹ Monitoring is required only when emission unit is operating.

G. No. 1 Power Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.G.1	Particulate	0.1 gr./dscf @ 7% O ₂ , hourly average.	Based on calculations for maximum emissions, this boiler cannot exceed the grain loading limit when firing natural gas or fuel oil. Sulfur content limit of ≤ 2% for fuel oil is intended to indicate compliance with the particulate standard. Permittee shall keep records of receipts showing all oil fired is of ≤ 2% sulfur.	WAC 173-405-040(5)(c)
I.G.2		229 lbs./day, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the mass loading limit when firing natural gas. When firing with fuel oil, pounds per day average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Report emissions annually.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.G.3	SO ₂	3025 lbs./day, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the SO ₂ mass loading limit when firing natural gas. Fuel oil may be fired during natural gas interruption or curtailment. When firing with fuel oil, daily average value is calculated using emission factor from AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Report emissions annually. Fuel oil fired cannot exceed ≤ 2% sulfur content by weight. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	PSD-X-77-04 and DE 95AQI055 as consolidated in Order DE 96-AQI078

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

I.G.4	SO ₂	8750 lbs./day from No. 1 and No. 2 power boilers combined, daily average.	Based on calculations for maximum emissions, the boilers cannot exceed the combined mass loading limit when exclusively firing natural gas. When firing with fuel oil, daily average value is calculated using emission factor from AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Fuel oil fired cannot exceed ≤ 2% sulfur content by weight. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
I.G.5		1104 tpy from No. 1 and No. 2 power boilers combined, annual average.	Based on calculations for maximum emissions, the boilers cannot exceed the combined mass loading limit when exclusively firing natural gas. When firing with fuel oil, annual average value is calculated using emission factor from AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Fuel oil fired cannot exceed ≤ 2% sulfur content by weight. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

H. No. 2 Power Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
I.H.1	Particulate	0.1 gr./dscf @ 7% O ₂ , hourly average.	Based on calculations for maximum emissions, this boiler cannot exceed the grain loading limit when firing natural gas or fuel oil. Compliance is demonstrated through normal operation. Maintain records of type of fuel used.	WAC 173-405-040(5)(c)

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

I.H.2	SO ₂	≤ 2% sulfur in fuel oil fired.	Fuel oil fired cannot exceed ≤ 2% sulfur content by weight. Maintain fuel receipts showing that all oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
I.H.3		8750 lbs./day from No.1 and No. 2 power boilers combined, daily average.	Based on calculations for maximum emissions, the boiler cannot exceed the limit when firing exclusively natural gas. When firing with fuel oil, daily average value is calculated using emission factor from AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Fuel oil fired cannot exceed 2% sulfur content by weight. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
I.H.4		1104 tpy from No. 1 and No. 2 power boilers combined, annual average.	Based on calculations for maximum emissions, the boiler cannot exceed the limit when firing exclusively natural gas. When firing with fuel oil, annual average value is calculated using emission factor from AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Fuel oil fired cannot exceed 2% sulfur content by weight. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

I. No. 1 and No. 2 M&D Digesters; No. 1 and No. 2 Evaporator Sets; and Concentrators

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
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	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.I.1	TRS	Treat all collectible noncondensable gas (NCG) to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln.	Record the number of hours that NCGs generated were not combusted each month and conduct monthly NCG system inspections. Report periods of such non-combustion monthly. Periods of non-combustion arising from the need to prevent loss of life or limb are not subject to this requirement, and need not be considered in determining total monthly periods of non-combustion.	WAC 173-405-040(4)

¹ Monitoring is required only when emission unit is operating

J. KAMYR Digester and No. 3 Evaporator Set

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.J.1	TRS	Combust collectible non-condensable gas (NCG) at a minimum temperature of 1200°F for at least 0.5 seconds.	Record all 12-hour periods during which NCGs generated were not combusted. Report periods of such non-combustion monthly. By intrinsic design, the NCG incineration units (Hog Fuel Boiler and Lime Kiln) meet the temperature and residence time requirements.	40 CFR 60.283(a)(1)

¹ Monitoring is required only when emission unit is operating

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
I.J.2	TRS	Treat all collectible non-condensable gas (NCG) to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln.	Record the number of hours that NCGs generated were not combusted each month and conduct monthly NCG system inspections. Report periods of such non-combustion monthly. Periods of non-combustion arising from the need to prevent loss of life or limb are not subject to this requirement, and need not be considered in determining total monthly periods of non-combustion.	WAC 173-405-040(4)

¹ Monitoring is required only when emission unit is operating

K. Chlorine Dioxide Generation Unit and Bleach Plant

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
I.K.1	Chlorine and chlorine dioxide from R8 Vent Gas Scrubber	Maximum chilled water temperature of 50°F, hourly average.	Monitor new No. 3 (York) Chiller chilled water temperature continuously as a performance indicator. If chilled water temperature exceeds 50°F based on an hourly average, permittee will take corrective action within 72 hours. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078
I.K.2	Chlorine and chlorine dioxide from R8 Tail Gas Scrubber	Scrubbing liquid pH at minimum of 10.0, hourly average.	Monitor scrubber pH continuously as a performance indicator. If scrubbing liquid pH falls below 10.0 based on an hourly average, permittee will take corrective action within 72 hours. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078
I.K.3		Scrubbing liquid volumetric flow rate, hourly average.	Maintain the recirculation scrubbing liquid flow at the minimum at 50 gallons per minute as a performance indicator. If scrubbing liquid flow rate falls below 50 gallons per minute based on an hourly average, permittee will take corrective action within 72 hours. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

L. Cyclone Box Clipping Collection System

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
I.L.1	Particulate	0.18 tpy, annual average.	The permittee shall provide quarterly inspection of the cyclone when the unit is in operation. Inspection log shall be maintained and made available for inspection by Ecology. When the cyclone malfunctions, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report excursions and corrective action in the monthly report.	Order DE 95AQI084 Modification I as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

II. Operating Scenario 2: Upon Startup of No. 3 Recovery Furnace with Tri-level Air Equipment

Upon the startup of No. 3 Recovery Furnace with tri-level air equipment as originally permitted under Scenario 1 of both PSD-95-04 and DE95AQI055, all specific requirements presented in section I, including I.A, I.B, I.C, I.D, I.E, I.F, I.G, I.H, I.I, I.J, I.K, and I.L shall be terminated and be replaced with the following conditions:

A. No. 2 Recovery Furnace

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
II.A.1	Particulate	0.044 gr/dscf @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition II.A.7 for minimum O&M requirements intended to indicate compliance with the particulate limit.	40 CFR 60.282(a)(1)(i)
II.A.2		476 lb/day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report test results in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQI078
II.A.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. If the total number of contiguous periods of excess emissions in a quarter is less than six percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement. The Permittee shall comply with Condition II.A.7 for opacity monitoring and reporting requirements.	40 CFR 60.11(b) 40 CFR 60.13(h) 40 CFR 60.282(a)(1)(ii), 40 CFR 60.284(e)(1)(ii) WAC 173-405-040(6)
II.A.4	SO ₂	500 ppm @ 8% O ₂ , hourly average.	Sample monthly consisting of one 1-hour test using DOE Method 6 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The permittee shall monitor mill white liquor sulfidity as a performance indicator. If the mill white liquor sulfidity exceeds 33%, based on a 24-hour average, calculated daily, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of the permit. Report corrective actions in the monthly report.	WAC 173-405-040(11)(a)
II.A.5		5424 lb/day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report excursions in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQI078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.A.6	TRS	5 ppmvd @ 8% O ₂ , 12-hour average.	Monitor continuously using DOE Method 12. Report excursions in the monthly report. If the total number of contiguous periods of excess emissions in a quarter is less than one percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement.	40 CFR 60.283(a)(2), 40 CFR 60.284(e)(1)(i)
II.A.7	Operation	Minimum operating condition	Monitor opacity continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B and App. F, Perf. Spec. 1. The permittee shall operate the continuous opacity monitor as a performance indicator to show continuous operation of the pollution control device. If opacity exceeds 35 percent for more than 6 consecutive minutes in any 60 minute period, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report corrective actions and performance indicator deviations in the monthly report.	WAC 173-405-040(10)

¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

B. No. 3 Recovery Furnace

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.B.1	Particulate	0.027 gr/dscf @ 8% O ₂ , hourly average. 0.021 gr/dscf @ 8% O ₂ , rolling annual average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ^{2,3} . The Permittee shall comply with Condition II.B.17 for minimum O&M requirements intended to indicate compliance with the particulate limit.	DE 95AQI055 as consolidated in Order DE 96-AQI078
II.B.2		186 tpy, rolling annual average.	Annual average value is calculated using actual emissions from previous stack test results. Report test results in the monthly report ² .	DE 95AQI055 as consolidated in Order DE 96-AQI078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.B.3	Opacity	Average 20% when firing fuel oil, for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.B.17 for opacity monitoring and reporting requirements.	40 CFR 60.43b(f) for basis of opacity limit. 40 CFR 60.46b(d)(7) for basis of compliance test method.
II.B.4		35%, 6-minute average.	EPA Method 9 is the reference test method. If the total number of contiguous periods of excess emissions in a quarter is less than six percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement. The Permittee shall comply with Condition II.B.17 for opacity monitoring and reporting requirements.	40 CFR 60.11(b) 40 CFR 60.13(h) 40 CFR 60.282(a)(1)(ii), 40 CFR 60.284(e)(1)(ii)
II.B.5		Average 35% for more than 6 consecutive minutes in any 60-minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.B.17 for opacity monitoring and reporting requirements.	WAC 173-405-040(6)
II.B.6	SO ₂	155 ppmvd @ 8% O ₂ , daily average.	Monitor continuously using an approved CEM and operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 2. Report excursions in the monthly report.	DE 95AQI055 as consolidated in Order DE 96-AQI078
II.B.7		500 ppmvd @ 8% O ₂ , hourly average.	Monitor continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 2. Report excursions in the monthly report ² .	WAC 173-405-040(11)(a)
II.B.8		1592 tpy, annual average.	Annual average value is calculated using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 2. Annually report emissions.	DE 95AQI055 as consolidated in Order DE 96-AQI078
II.B.9	NO _x	112 ppmvd @ 8% O ₂ , daily average.	Monitor continuously using an approved CEM that conforms to 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 2. Report excursions in the monthly report.	PSD-95-04 as consolidated in Order DE 96-AQI078
II.B.10		825 tpy, annual average.	Annual average value is calculated using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 2. Annually report emissions.	PSD-95-04 as consolidated in Order DE 96-AQI078
II.B.11	CO	300 ppmvd @ 8% O ₂ , hourly average.	Monitor continuously using an approved CEM that conforms to 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 4. Report excursions in the monthly report.	PSD-95-04 as consolidated in Order DE 96-AQI078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.B.12	CO (Cont'd)	1355 tpy, annual average.	Annual average value is calculated using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 4. Annually report emissions.	PSD-95-04 as consolidated in Order DE 96-AQI078
II.B.13	VOC	0.05 lb/MMBTU, hourly average. Source test during the last year of permit term.	Sample consists of one 1-hour test using EPA Method 25A or a test method approved in writing by Ecology once per permit term. The Permittee is required to conduct the test at the recovery boiler's full load. Report test results with the renewal permit application. The Permittee shall comply with Condition II.B.17 for O&M requirements intended to indicate compliance with the VOC limit.	PSD-95-04 as consolidated in Order DE 96-AQI078 WAC 173-405-040(10) for O&M requirements
II.B.14		179 tpy annual average.	Annual average value is calculated using actual emissions from previous stack test results. Report test results with the renewal permit application.	PSD-95-04 as consolidated in Order DE 96-AQI078
II.B.15	TRS	5 ppmvd @ 8% O ₂ , 12-hour average.	Monitor continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 5. Report only excursions in the monthly report. If the total number of contiguous periods of excess emissions in a quarter is less than one percent of the total number of operating hours (excluding periods of startup, shutdown, or malfunction) during the quarter, the excess emissions do not constitute a violation of this requirement.	40 CFR 60.282(a)(2), 40 CFR 60.284(e)(1)(i)
II.B.16		27 tpy, annual average.	Annual average value is calculated using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B, Perf. Spec. 5. Annually report emissions.	PSD-95-04 as consolidated in Order DE 96-AQI078

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.B.17	Operation	Minimum operating condition	Monitor opacity continuously using an approved CEM and is operated in conformance with 40 CFR Pt. 60 (July 1, 1992), App. B and App. F, Perf. Spec. 1. The permittee shall operate the continuous opacity monitor as a performance indicator to show continuous operation of the pollution control device. If opacity exceeds the limit as specified in II.B.3 for more than 6 consecutive minutes in any 60 minute period, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report corrective actions and performance indicator deviations in the monthly report.	WAC 173-405-040(10) 40 CFR 60.48b(a) for continuous monitoring requirement.

¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

³ Boise Cascade will record levels of precipitator voltage and current during particulate compliance source testing for informational purpose only.

C. Lime Kiln

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.C.1	Particulate	0.12 gr/dscf @ 10% O ₂ when firing with fuel oil, 0.067 gr/dscf @ 10% O ₂ when firing with natural gas, hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology ² . Report test results in the monthly report ³ . The Permittee shall comply with Condition II.C.8 for O&M requirements intended to indicate compliance with the particulate limit.	PSD-X-77-04 as consolidated in Order DE 96-AQI078 for basis of particulate limit when firing with fuel oil, 40 CFR 60.282(a)(3)(i) for basis of particulate limit when firing with natural gas.
II.C.2		906 lb/day when firing with fuel oil, 466 lb/day when firing with natural gas, rolling annual average.	Daily average value is calculated using actual emissions from pervious stack test results ² . Report results in the monthly report ³ .	PSD-X-77-04 as consolidated in Order DE 96-AQI078
II.C.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.C.8 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
II.C.4	SO ₂	500 ppmvd @ 10% O ₂ , hourly average.	Sample consisting of one 1-hour test per quarter using DOE Method 6 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition II.C.8 for O&M requirements intended to indicate compliance with the SO ₂ limit.	WAC 173-405-040(11)(a)
II.C.5		5 ppmvd @ 10% O ₂ , rolling annual average.	Sample consisting of one 1-hour test per quarter using DOE Method 6 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition II.C.8 for O&M requirements intended to indicate compliance with the SO ₂ limit.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
II.C.6		19 lb/day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report test results quarterly in the monthly report.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
II.C.7	TRS	8 ppmvd @ 10% O ₂ , 12-hour average.	Sample continuously using DOE Method 12. Report only excursions in the monthly report.	40 CFR 60.13(d)(1) 40 CFR 60.284(a)(2) 40 CFR 60.283(a)(5)
II.C.8	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 1000 gpm for greater than one hour, the permittee will initiate corrective action within 24 hours to bring the scrubber liquid flow to 1000 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average deviations and corrective action in the monthly report. Scrubber pressure drop shall be monitored.	WAC 173-405-040(10) 40 CFR 60.284(b)(2)(i)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

II.C.9	TRS	80 ppmvd @ 10% O ₂ for two consecutive hours.	Sample continuously using DOE Method 12. Report only excursions in the monthly report.	WAC 173-405-040(3)(b)
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¹ Monitoring is required only when emission unit is operating.

² Lime kiln particulate tests will be performed on the fuel being fired on the day of the scheduled test. Tests will not be scheduled for the purpose of testing the lime kiln while firing a particular fuel type.

³ If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

D. No. 2 Smelt Tank

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
II.D.1	Particulate	0.2 lb/ton of black liquor solids (dry weight), hourly average.	Sample monthly consisting of one 1-hour test using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition II.D.5 for O&M requirements intended to indicate compliance with the particulate limit.	40 CFR 60.282(a)(2), WAC 173-405-040(2)
II.D.2		71 lb/day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report results in the monthly report ² .	PSD-X-77-04 as consolidated in Order DE 96-AQI078
II.D.3	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.D.5 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)
II.D.4	TRS	0.033 lb/ton of black liquor solids as H ₂ S, annual average.	Sampling consists of one test per year using Method 16A/6C bag sample or a test method approved in writing by Ecology. Report test results annually.	40 CFR 60.283(a)(4)
II.D.5	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 20 gpm for greater than one hour, the permittee will initiate corrective action within 24 hours to bring the scrubber liquid flow to 20 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average deviations and corrective action in the monthly report.	WAC 173-405-040(10)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

II.D.6	Damper position	None	Report only bypass periods.	DE 78-112 as consolidated in Order DE 96-AQI078
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¹ Monitoring is required only when emission unit is operating. Scrubber pressure drop shall be monitored per 40 CFR 60.284(b)(2)(i).

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

E. No. 3 Smelt Tank

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.E.1	Particulate	0.3 lb/ton of black liquor solids, hourly average.	Sampling consists of one 1-hour test per month using EPA Method 5 or a test method approved in writing by Ecology. Report test results in the monthly report ² . The Permittee shall comply with Condition II.E.3 for O&M requirements intended to indicate compliance with the particulate limit.	WAC 173-405-040(2)
II.E.2	Opacity	Average 35% for more than 6 consecutive minutes in any 60 minute period.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.E.3 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-405-040(6)
II.E.3	Operation	Minimum operating condition	Monitor scrubbing liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 20 gpm for greater than one hour, the permittee will initiate corrective action within 24 hours to bring the scrubber liquid flow to 20 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average deviations and corrective action in the monthly report.	WAC 173-405-040(10)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

II.E.4	Damper position	None	Record the damper position. Report only bypass periods.	DE 78-112 as consolidated in Order DE 96-AQ1078
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¹ Monitoring is required only when emission unit is operating.

² If monitored emissions are equal to or less than 75% of the emission limitation for any six consecutive months, emissions will be monitored by one 1-hour test per quarter and reported quarterly. There shall be no more than 105 days between each quarterly tests. If monitored emissions are greater than 75% of the emission limitation in any of the previous six months, the monitoring and reporting frequency will be as stated in the table.

F. Hog Fuel Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
II.F.1	Particulate	0.04 gr/dscf @ 12% CO ₂ , average of three 1-hour tests.	Sample quarterly consisting of three 1-hour tests using EPA Method 5 or a test method approved in writing by Ecology. Report test results quarterly. The Permittee shall comply with Condition II.F.4 for O&M requirements intended to indicate compliance with the particulate limit.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
II.F.2		459 lb/day, rolling annual average.	Daily average value is calculated using actual emissions from previous stack test results. Report results quarterly.	PSD-X-77-04 as consolidated in Order DE 96-AQ1078
II.F.3	Opacity	Average 20% for more than 3 consecutive minutes in any 60 minute period, except for emissions due to soot blowing or grate cleaning for up to 15 minutes in 8 consecutive hours.	EPA Method 9 is the reference test method. The Permittee shall comply with Condition II.F.4 for opacity monitoring and reporting requirements intended to indicate compliance with the opacity limit.	WAC 173-400-070(2)(a) for basis of opacity limit.
II.F.4	Operation	Minimum operating condition	Monitor scrubber liquid flow continuously as a performance indicator. Record 1-hour averages once every hour. Whenever hourly scrubber liquid flow falls below 800 gpm for greater than one hour, the permittee will initiate corrective action within 24 hours to bring the scrubber liquid flow to 800 gpm or greater. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report 1-hour average deviations and corrective action in the monthly report.	WAC 173-405-040(10) WAC 173-400-105(5)(d)

¹ Monitoring is required only when emission unit is operating.

G. No. 1 Power Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.G.1	Particulate	0.1 gr/dscf @ 7% O ₂ , hourly average.	Based on calculations for maximum emissions, this boiler cannot exceed the grain loading limit when firing natural gas or fuel oil. Sulfur content limit of $\leq 2\%$ for fuel oil is intended to indicate compliance with the particulate standard. Permittee shall keep records of receipts showing all oil fired is of $\leq 2\%$ sulfur.	WAC 173-405-040(5)(c)
II.G.2		229 lb/day, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the mass loading limit when exclusively firing natural gas. When firing with fuel oil, daily average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of $\leq 2\%$ sulfur. Report emissions annually.	PSD-X-77-04 as consolidated in Order DE 96-AQI078
II.G.3	SO ₂	3025 lb/day, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the mass loading limit when exclusively firing natural gas. Fuel oil may be fired during natural gas interruption or curtailment. When firing with fuel oil, daily average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of $\leq 2\%$ sulfur. Report emissions annually. Maintain fuel receipts showing that all fuel oil fired is $\leq 2\%$ sulfur.	PSD-X-77-04 and DE 95AQI055 as consolidated in Order DE 96-AQI078

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

II.G.4	SO ₂	8750 lb/day from No. 1 and No. 2 power boilers combined, daily average.	Based on calculations for maximum emissions, this boiler cannot exceed the limit when exclusively firing natural gas. When firing with fuel oil, daily average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of $\leq 2\%$ sulfur. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is $\leq 2\%$ sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
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II.G.5	SO ₂ (Cont'd)	1104 tpy from No. 1 and No. 2 power boilers combined, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the limit when exclusively firing natural gas. When firing with fuel oil, annual average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
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¹ Monitoring is required only when emission unit is operating.

H. No. 2 Power Boiler

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting ¹	Applicable Requirement(s)
II.H.1	Particulate	0.1 gr/dscf @ 7% O ₂ , hourly average.	Based on calculations for maximum emissions, this boiler cannot exceed the grain loading limit when firing natural gas or fuel oil. Sulfur content limit of ≤ 2% for fuel oil is intended to indicate compliance with the particulate standard. Maintain records of type of fuel used.	WAC 173-405-040(5)(c)

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

II.H.2	SO ₂	≤ 2% sulfur in fuel oil fired.	Sulfur content limit of ≤ 2% for fuel oil is intended to indicate compliance with the SO ₂ standard. Maintain fuel receipts showing that all oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
II.H.3		8750 lb/day from No.1 and No. 2 power boilers combined, daily average.	Based on calculations for maximum emissions, the unit cannot exceed the limit when exclusively firing natural gas. When firing with fuel oil, daily average value is calculated as using emission factor from EPA's AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078
II.H.4		1104 tpy from No. 1 and No. 2 power boilers combined, annual average.	Based on calculations for maximum emissions, this boiler cannot exceed the mass loading limit when exclusively firing natural gas. When firing with fuel oil, annual average value is calculated using emission factor from EPA's AP-42 (10/96) with fuel oil of ≤ 2% sulfur. Report emissions in the monthly report. Maintain fuel receipts showing that all fuel oil fired is ≤ 2% sulfur.	DE 95AQI055 as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

I. No. 1 and No. 2 M&D Digesters; No. 1 and No. 2 Evaporator Sets; and Concentrators

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.I.1	TRS	Treat all collectible non-condensable gas (NCG) to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln.	Record the number of hours that NCGs generated were not combusted each month and conduct monthly NCG system inspections. Report periods of such non-combustion monthly. Periods of non-combustion arising from the need to prevent loss of life or limb are not subject to this requirement, and need not be considered in determining total monthly periods of non-combustion.	WAC 173-405-040(4)

¹ Monitoring is required only when emission unit is operating

J. KAMYR Digester and No. 3 Evaporator Set

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.J.1	TRS	Combust collectible non-condensable gas (NCG) at a minimum temperature of 1200°F for at least 0.5 seconds.	Record all 12-hour periods during which NCGs generated were not combusted. Report periods of such non-combustion monthly. By intrinsic design, the NCG incineration units (Hog Fuel Boiler and Lime Kiln) meet the temperature and residence time requirements.	40 CFR 60.283(a)(1)

The following **state-only** requirement is not federally enforceable under the federal Clean Air Act:

II.J.2	TRS	Treat all collectible non-condensable gas (NCG) to reduce TRS emissions equal to reduction achieved by thermal oxidation in a lime kiln.	Record the number of hours that NCGs generated were not combusted each month and conduct monthly NCG system inspections. Report periods of such non-combustion monthly. Periods of non-combustion arising from the need to prevent loss of life or limb are not subject to this requirement, and need not be considered in determining total monthly periods of non-combustion.	WAC 173-405-040(4)
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¹ Monitoring is required only when emission unit is operating.

K. Chlorine Dioxide Generation Unit and Bleach Plant

The following **state-only** requirements are not federally enforceable under the federal Clean Air Act:

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.K.1	Chlorine and chlorine dioxide from R8 Vent Gas Scrubber	Maximum chilled water temperature of 50°F, hourly average.	Monitor new No. 3 (York) Chiller chilled water temperature continuously as a performance indicator. If chilled water temperature exceeds 50°F based on an hourly average, permittee will take corrective action within 72 hours. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078
II.K.2	Chlorine and chlorine dioxide from R8 Tail Gas Scrubber	Scrubbing liquid pH at minimum of 10.0, hourly average.	Monitor scrubber pH continuously as a performance indicator. If scrubbing liquid pH falls below 10.0 based on an hourly average, permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be violation of the underlying applicable requirement. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078
II.K.3		Scrubbing liquid volumetric flow rate, hourly average.	Maintain the recirculation scrubbing liquid flow at the minimum at 50 gallons per minute as a performance indicator. If scrubbing liquid flow rate falls below 50 gallons per minute based on an hourly average, permittee will take corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be violation of the underlying applicable requirement. Report only excursions in the monthly report.	DE 92-AQI045 as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

L. Cyclone Box Clipping Collection System

	Parameter	Limit & Averaging Period (shall not exceed)	Monitoring & Reporting¹	Applicable Requirement(s)
II.L.1	Particulate	0.18 tpy, annual average.	The permittee shall provide quarterly inspection of the cyclone when the unit is in operation. Inspection log shall be maintained and made available for inspection by Ecology. When the cyclone malfunctions, the permittee will initiate corrective action within 24 hours. Failure to initiate corrective action within 24 hours is a violation of WAC 173-405-040(10) and may be a violation of the underlying applicable requirement. Report excursions and corrective action in the monthly report.	Order DE 95AQI084 Modification I as consolidated in Order DE 96-AQI078

¹ Monitoring is required only when emission unit is operating.

FACILITY-WIDE GENERAL REQUIREMENTS [WAC 173-401-600]

These generally applicable requirements apply facility-wide, including insignificant emission units or activities. Insignificant emission units or activities, however, are not subject to monitoring, testing, recordkeeping, reporting, or compliance certification requirements.

1. The permittee cannot vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations. [WAC 173-400-205]
2. The permittee shall not cause or permit emission of any contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business. [WAC 173-400-040(5)]
3. The permittee shall not install or use any means that conceal or mask an emission of an air contaminant that would otherwise violate provisions in this permit. [WAC 173-400-040(7)]
4. The permittee shall take reasonable precautions to prevent the release of air contaminants from emission units engaged in material handling, construction, demolition, or any other operation that is a source of fugitive emissions. [WAC 173-400-040(3)(a)]
5. The permittee shall take reasonable precautions to prevent fugitive dust from becoming airborne and maintain and operate the source to minimize emissions. [WAC 173-400-040(8)(a)]
6. The following condition is **state-only** and is not federally enforceable under the Clean Air Act: No deposit of particulate matter beyond property line so as to interfere unreasonably with use and enjoyment. [WAC 173-400-040(2)]
7. The following condition is **state-only** and is not federally enforceable under the Clean Air Act: Any person causing odor which may unreasonably interfere with use & enjoyment of property must use recognized good practice and procedures to reduce odors to a reasonable minimum. [WAC 173-400-040(4)]
8. The permittee may not cause or allow the emission of a plume from any emission unit other than a kraft recovery furnace, smelt dissolver tank, or lime kiln that has an average opacity greater than 20% for more than 6 consecutive minutes in any 60 minute period except as provided in WAC 173-405-040(6). [WAC 173-405-040(6)]
9. Except where specific requirements are defined elsewhere, the permittee shall assure compliance with conditions 1 through 8 by recordkeeping of actions taken by the permittee in response to complaints received by the permittee or of possible noncompliance noticed by the facility staff in day to day operation.. The permittee shall assess the validity of each air quality complaint and commence corrective action, if warranted, as soon as possible but no

later than 3 working days of receiving the complaint. The permittee shall keep records of the following: air quality complaints received; the assessment of validity; and what, if any, corrective action is taken in response to the air quality complaint. [WAC 173-401-630]

10. The emission of sulfur dioxide from any emissions unit other than a recovery furnace or lime kiln shall not exceed 1,000 parts per million for an hourly average, corrected to 7% oxygen for combustion units. [WAC 173-405-040(11)(b) or WAC 173-400-040(6)]
11. Where this permit specifically requires continuous monitoring, the source shall calibrate, maintain and operate equipment for continuously monitoring and recording the emissions specified, consistent with Ecology's source test manual or 40 CFR 60, as applicable. The source may be temporarily exempted from monitoring and reporting requirements during periods of monitoring system malfunctions, provided that the source shows to Ecology's satisfaction that the malfunction was unavoidable and is being repaired as expeditiously as practicable. [WAC 173-400-105(5)(h)]

Ecology recognizes that monitoring data may be unobtainable for legitimate reasons. The permittee shall make every reasonable effort to acquire, maintain, and recover valid monitoring data. Except where an applicable requirement contains more stringent provisions, permittee shall recover valid monitoring data and recordkeeping for at least 90% of the averaging periods during each month or, if no averaging period is used, collected during each month, in which this permit requires monitoring of a process or parameter. The 10 % allowance is contingent on the permittee providing an acceptable explanation for the loss of monitoring data. [WAC 173-401-615]

12. The Permittee shall at all times, including periods of abnormal operation and upset conditions, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to Ecology which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [WAC 173-405-040(10); 40 CFR §60.11(d) for Power Boilers #1 and #2]

The Permittee will assure compliance with this term through compliance with the terms and conditions of this permit. [WAC 173-401-615]

13. Chemical Accidental Release Program - This stationary source, as defined in 40 CFR Part 68.3, is subject to part 68, the accidental release prevention regulations. This stationary source shall submit a risk management plan (RMP) by date specified in section 68.10. This stationary source shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR part 70 or 71.
14. Ozone Protection - The permittee shall comply with the applicable standards for recycling and emissions reductions, not specifically declared as inapplicable elsewhere in this permit, pursuant to 40 CFR Part 82, Subpart F.

- a. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" is defined at § 82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds or refrigerant purchased and added to such appliances must do so in compliance with §82.166.
15. National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.
 - a) Permittee shall comply with the applicable requirements of the National Emissions Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR §§ 63.440-458) within three years of the effective date of the rule; with the exception of the standards for Kraft pulp system provisions of § 63.443, for which the compliance deadline is eight years after the effective date. 40 CFR § 63.440(d)
 - b) Permittee shall submit the initial notification report specified under 40 CFR § 63.9(b)(2) within one year after the effective date. 40 CFR 63.455(a)
 - c) Permittee shall submit, with the initial notification report required in paragraph b above, and every two years thereafter, a non-binding control strategy report containing at a minimum, in addition to the information required under 40 CRF § 63.9(b)(2) the following:
 - i) A description of the emission controls or process modifications selected for compliance with the control requirements in this standard.
 - ii) A compliance schedule, including the dates by which each step toward compliance will be reached for each commission point or sets of emission points.
15. The Permittee will continue to comply with applicable requirements with which the Permittee is in compliance. WAC 173-401-630(3) and 510(2)(h)(iii)(A)
16. The Permittee will meet applicable requirements that become effective during the permit term on a timely basis. WAC 173-401-630(3) and 510(2)(h)(iii)(B)
17. Volatile Organic Liquid Storage Vessels - The Permittee shall keep records showing the dimensions and capacities of all storage vessels having capacities greater than or equal to 40 cubic meters that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. These records are to be kept for the life of each storage vessel [40 CFR 60.116b (a) and (b)]
18. Reserved for future use.

19. Reserved for future use.
20. The following condition is **state-only** and is not federally enforceable under the Clean Air Act. The permittee can burn used oil only if it meets standards prescribed in RCW 70.94.610(1). [RCW 70.94.610]
21. The permittee must comply with 40 CFR sections 61.145 and 61.150 and WAC 173-400-075 if asbestos-containing material is present above specified quantities in a facility being demolished or renovated. [40 CFR Part 61, Subpart M]

MONITORING, RECORDKEEPING & REPORTING

Monitoring Requirements [WAC 173-401-630(5)(b)]

22. Unit-Specific Requirements. The permittee shall conduct routine monitoring of emissions in accordance with the program of monitoring or testing required for specific emission units in conditions A through K, sections I or II of this permit. [WAC 173-405-072]
23. Unavoidable Excess Emissions. This condition applies , where applicable, to excess emissions that are claimed to be unavoidable pursuant to WAC 173-400-107. The permittee may include in its reports demonstrations that excess emissions were unavoidable, consistent with the requirements of WAC 173-400-107. The permittee shall have the burden to prove that deviations from permit terms were unavoidable. Excess emissions that are unavoidable are excused and not subject to penalty. [WAC 173-400-107]
24. Violation Duration. A violation of an emission limit in this permit is presumed to commence at the time of the testing, recordkeeping or monitoring indicating noncompliance, and to continue until the time of retesting, recordkeeping or monitoring that indicates compliance. This presumption may be defeated if credible evidence shows that the violation was of longer duration, that there were intervening days during which no violation occurred or that the violation was not continuing in nature [42 U.S.C. 7413(e)(2)]. The permittee may conduct monitoring or testing more frequently than required by this permit to demonstrate compliance with an emission limit.
25. Insignificant Emission Units (IEUs). The permittee is not subject to any testing, monitoring, reporting, or recordkeeping for the insignificant emission units or activities listed [WAC 173-401-530(2)(c)].

Recordkeeping Requirements

26. The permittee shall keep records of any periodic and continuous monitoring required by this permit. These records shall include the following, where applicable:

- a. The date, place as defined in requirement, and time of sampling or measurement;
 - b. The date(s) analysis were performed;
 - c. The company or entity that performed the analysis;
 - d. The analytical techniques or methods used;
 - e. The results of such analysis;
 - f. The operating conditions existing at the time of sampling or measurement. [WAC 173-401-615(2)(a); WAC 173-400-105; 40 CFR §60.49b(f).]
- 27. The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-724(5)]
- 28. The permittee shall retain records of all required monitoring data and support information for a period of 5 years from the date of monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c); 40 CFR §60.49b(o)]
- 29. The permittee shall maintain a contemporaneous record of any deviation from the requirements of this permit. [WAC 173-401-615(3)(b)]

Reporting Requirements [WAC 173-401-520, -615(3), & -710]

- 30. In addition to any emission unit specific reporting requirements identified below, emission unit specific requirements are identified in Section I or II, Conditions A through L.
- 31. Report within 15 days of the end of each month average daily production of air-dried unbleached pulp. [WAC 173-405-072(4)]
- 32. Monitoring reports required by this permit must be submitted to Ecology within 15 days of the end of each calendar month. [WAC 173-401-072.] The reports must clearly identify all instances of deviations from permit requirements. [WAC 173-401-615(3)(a)]
- 33. Submit an inventory of emissions from the source each year no later than 105 days after the end of the calendar year; maintain records of information necessary to substantiate any reported emissions. The permittee is not required to include units identified as insignificant under WAC 173-401-530. [WAC 173-400-105(1)]
- 34. The permittee shall promptly submit a report of any deviations from permit conditions. [WAC 173-401-615(3)(b)]
 - a. For purposes of this permit, submitting a report "promptly" means the following: (a) if the deviation presents a potential threat to human health or safety, the report shall be made as soon as possible but no later than 12 hours after the discovery of the

deviation; (b) for other deviations, "promptly" means that the deviations are identified in the respective monthly report.

- b. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. [WAC 173-401-615(3).] The permittee may include in its reports demonstrations that excess emissions, excursions or deviations were unavoidable, consistent with the requirements of WAC 173-400-107.
35. Certification of truth, accuracy and completeness. Any application form, report or compliance certification required to be submitted by this permit or by Chapter 401 WAC shall contain certification by a responsible official of truth, accuracy and completeness. For purposes of this section, "report" shall mean monthly monitoring reports or other report required to be submitted by Chapter 401 WAC, and other formal documents required under this permit and shall not include prompt deviation reports pursuant to paragraph 34 and informal correspondence, notes, or information. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [WAC 173-401-520]
36. All reports and renewal applications required by this permit shall be submitted to:
- Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, WA 98504-7706
37. Compliance Certification. The permittee shall submit a report to the Department of Ecology and to EPA Region X within 105 days after the close of the calendar year, and every year thereafter, certifying compliance with the terms and conditions contained in this permit for the previous calendar year. The initial compliance certification shall cover the period from when the permit is effective to the end of the calendar year. The certification shall describe the following:
- a. the permit term or condition that is the basis of the certification;
 - b. the compliance status;
 - c. whether compliance was continuous or intermittent; and
 - d. the methods used for determining compliance. [WAC 173-401-630(5)]

The compliance status (condition 37b.) shall be based on compliance with the final averaging period of the annual certification period. Determination of continuous or intermittent compliance (condition 37c.) shall be based on compliance during the entire annual certification period. The permittee is not required to certify compliance for insignificant emission units or activities. [WAC 173-401-530(2)(d)]

STANDARD TERMS & CONDITIONS

38. **Duty to Comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for potential enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [WAC 173-401-620(2)(a)]
39. **Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b)]
40. **Permit Actions.** This permit may be modified, revoked, reopened, and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]
41. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d)]
42. **Duty to Provide Information.** The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the permitting authority along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205. [WAC 173-401-620(2)(e)]
43. **Permit Fees.** The permittee shall pay fees as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. [WAC 173-401-620(2)(f)]
44. **Emissions Trading.** No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g)]
45. **Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h)]
46. **Permit Appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on the permitting authority within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA. [WAC 173-401-620(2)(i)]

47. Permit Continuation. This permit is issued for a 5 year term; however, this permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j)]
48. Inspection and Entry. Upon consent of the permittee or upon presentation of credentials and other documents as may be required by law, the Department of Ecology or an authorized representative shall be allowed to:
- (1) Enter the source;
 - (2) Have access to and copy at reasonable times any records that must be kept under this permit and only those records;
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - (4) As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements. [WAC 173-400-105(4); WAC 173-401-630(2)]

PERMIT SHIELD

Compliance with the conditions in this permit is deemed to constitute compliance with applicable requirements as contained in this permit on which the term or condition is based, as of the date the permit is issued. [WAC 173-401-640(1)]

The Department of Ecology has determined that the requirements listed in Appendix A to this permit do not apply to the facility, as of the date the permit is issued, for the reasons specified. [WAC 173-401-640(2)]

APPENDIX A
Permit Shield/Inapplicable Requirements

All air quality requirements not specifically identified in this permit are considered inapplicable without qualifying actions on the part of either Ecology, the permittee, or both.

CITATION	SOURCE	TOPIC/PARAMETER	REASONING
WAC 173-400-040(1)	All sources	Opacity < 20%	Not applicable since the specific limits set in WAC Chapter 405 take precedence.
WAC 173-400-040(3)(a)	Material handling/construction in attainment areas.	Use reasonable methods to control fugitive emissions.	Facility is located in a PM nonattainment area.
WAC 173-400-040(6)	Any emission unit	SO ₂ emissions < 1,000 ppm	Not applicable since the specific limits set in WAC Chapter 405 take precedence.
WAC 173-400-050(1)	Combustion sources	Grain loading (0.1 gr./dscf)	Not applicable since the specific limits set in WAC Chapter 405 take precedence.
WAC 173-400-050(1)	Steam boiler firing wood derived fuel	<0.2 gr./dscf (Using EPA Method 5 testing)	Not applicable since the specific limits set in WAC Chapter 405 take precedence.
WAC 173-400-060	General process	Grain loading (0.1 gr./dscf)	Not applicable since the specific limits set in WAC Chapter 405 take precedence.
WAC 173-410	NSSC process	Various	The NSSC process does not use a sulfurous acid in conjunction with a sulfite or bisulfite salt.
WAC 173-405-040(1)(b)	Recovery Furnace stacks constructed before 1/1/70 and those recovery furnaces with direct contact evaporators.	TRS emissions < 17.5 ppm (8% O ₂ daily average)	None constructed before 1/1/70 and none with direct contact evaporators.
40 CFR 60.2	All sources	Definitions	General information and terms. Not applicable, no requirement described.
40 CFR 60.3	All sources	Units and Abbreviations	Abbreviations and symbols of units of measure. Not applicable, no requirement described.
40 CFR 60.4	All Sources	Address and Locations of Government Agencies	Not applicable, no requirement described.
40 CFR 60.5	N/A	Determination of Construction or Modification	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.6(a)	N/A	Review of Plans	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.9	N/A	Availability of Information	Requirement for State or Federal Agencies. Not applicable, no requirement described.

CITATION	SOURCE	TOPIC/PARAMETER	REASONING
40 CFR 60.10	N/A	State Authority	Requirement for State Agencies. Not applicable, no requirement described.
40 CFR 60.11(e)(6)	N/A	Review of the Opacity Data vs Performance Tests to Determine Opacity Standard	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.11(e)(7)	N/A	Granting Opacity Petition	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.11(e)(8)	N/A	Establishing Opacity Standard	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.13(i)	N/A	Alternate Monitoring Approval	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.13(j)	N/A	Alternate Test and Method Approval	Requirement for State or Federal Agencies. Not applicable, no requirement described.
40 CFR 60.14(h)	Electric Utility Steam Generation Unit.	Various	Not applicable, not an existing electric utility steam generation unit.
40 CFR 60.14(i)	DOE Repowering Projects	Various	Not applicable, not a repowering project.
40 CFR 60.14(j)	Repowering Project	Extension	Not applicable, not a repowering project.
40 CFR 60.14(k)	Temporary Clean Coal Technology Demonstration Project	Various	Not applicable, not a temporary clean coal technology demonstration project.
40 CFR 60.14(l)	Very Clean Coal-Fired Electric Utility Steam Generating Unit	Reactivation	Not applicable, not a very clean coal-fired electric utility steam generating unit
40 CFR 60.16	All Sources	Priority List	Not applicable, no requirement described.
40 CFR 60.17	All Sources	Incorporations by Reference	Not applicable, no requirement described.
40 CFR Part 60 Subpart D	Industrial fossil fuel steam generators	Various	None after 1971 that meet applicability.
40 CFR Part 60 Subpart Da	Electric utility steam generators (fossil fuel)	Various	Not an electric utility
40 CFR Part 60 Subpart Db	Industrial fossil fuel steam generators	Various	None after 1984
40 CFR Part 60 Subpart Dc	Industrial fossil fuel steam	Various	None after 1989

CITATION	SOURCE	TOPIC/PARAMETER	REASONING
	generators		
40 CFR Part 60 Subpart Kb except as specified in 40 CFR 60.116b(a-b)	Volatile organic liquid storage vessels	Various	Volatile organic liquid storage tanks at the mill with a capacity greater than 40 cubic meters contain liquids with a maximum true vapor pressure less than 3.5 kPa.
40 CFR 60.283(a)(3)	Cross kraft recovery furnaces constructed after 9/24/76	TRS emissions < 25 ppm by volume on a dry basis corrected to 8% O ₂	No cross kraft recovery furnaces present.
40 CFR 60.284(d)(3)(ii)	Digester systems, brown stock washer systems, multiple-effect evaporator systems, and condensate stripper systems constructed after 9/24/76 for which gases are combusted in a lime kiln not subject to this subpart	Semiannual reporting requirements	Lime Kiln is subject to the provisions of this subpart. Therefore, this regulation is not applicable to the named sources.
40 CFR 60.285(d)(3)	Recovery furnaces constructed after 9/24/76	When determining whether a furnace is a straight kraft or cross recovery furnace, must use TAPPI Method T.624 3 times daily.	Based on the intrinsic system design of the recovery furnaces that the black liquor cannot exceed 7% of the total pulp solids from the NSSC process. Thus, the furnaces are of the straight kraft variety. No further determinations are required.

APPENDIX B

Permit Shield/Non-Categorically, Non-Applicable Requirements

Those air quality requirements specifically identified in this appendix for Units subject to 40 CFR 60, are considered inapplicable to all other Units without qualifying actions on the part of either Ecology, the permittee, or both.

TOPIC/ PARAMETER	LIMIT & AVERAGE PERIOD	CITATION(S)	SOURCE	REASONING FOR NON- APPLICABILITY
Continuous Emissions Monitoring	Various	40 CFR 60.7 (c) 40 CFR 60.7 (d) 40 CFR 60.7 (e) 40 CFR 60.13(a) 40 CFR 60.13(b) 40 CFR 60.13(c) 40 CFR 60.13(d) 40 CFR 60.13(e) 40 CFR 60.13(f)	All sources except: No. 2 Recovery Furnace Lime Kiln	These units have no requirement for continuous emissions monitoring
Continuous Opacity Monitoring	Various	40 CFR 60.7 (a)(5) 40 CFR 60.7 (a)(6) 40 CFR 60.7 (a)(7) 40 CFR 60.11(b) 40 CFR 60.11(c) 40 CFR 60.11(e)(1) 40 CFR 60.11(e)(2) 40 CFR 60.11(e)(3) 40 CFR 60.11(e)(4) 40 CFR 60.11(e)(5) 40 CFR 60.13(c)	All sources except: No. 2 Recovery Furnace	These units have no requirement for continuous opacity monitoring
Particulate	0.044 gr./dscf @ 8% O ₂ , hourly average.	40 CFR 60.282(a)(1)(i)	No. 3 Recovery Furnace	The unit was not constructed or modified after September 24, 1976.
Opacity	Average 35% for more than 6 consecutive minutes in any 60	40 CFR 60.282(a)(1)(ii),	No. 3 Recovery Furnace	The unit was not constructed or modified after September 24, 1976.

TOPIC/ PARAMETER	LIMIT & AVERAGE PERIOD	CITATION(S)	SOURCE	REASONING FOR NON- APPLICABILITY
	minute period.			
TRS	5 ppmvd @ 8% O ₂ , 12-hour average.	40 CFR 60.283(a)(2),	No. 3 Recovery Furnace	The unit was not constructed or modified after September 24, 1976.
Particulate	0.2 lbs./ton of black liquor solids (dry weight), hourly average.	40 CFR 60.282(a)(2),	No. 3 Smelt Tank	The unit was not constructed or modified after September 24, 1976.
TRS	0.033 lbs./ton of black liquor solids as H ₂ S, annual average.	40 CFR 60.283(a)(4)	No. 3 Smelt Tank	The unit was not constructed or modified after September 24, 1976.
TRS emissions	< 5 ppm corrected to 10% O ₂ unless controlled using one of the methods listed and other provisions of this section are met	40 CFR 60.283(a)(1)	Brown Stock Washers No. 1 and No. 2 M&D Digesters No. 1 and No. 2 Evaporator Sets	These units were not constructed or modified after September 24, 1976. The No 2 M&D digester was constructed prior to September 24, 1976, but was relocated to the Wallula, WA site after the trigger date. This unit was not modified and is not subject to 40 CFR 60.
Reporting	Must report semiannually to the EPA periods of emissions for which the 12-hour TRS average exceeds 5 ppm (Satisfies the requirements of 40 CFR 60.7(c))	40 CFR 60.284(d)(3)(i)	Brown Stock Washers No. 1 and No. 2 M&D Digesters No. 1 and No. 2 Evaporator Sets	These units were not constructed or modified after September 24, 1976. The No 2 M&D digester was constructed prior to September 24, 1976, but was relocated to the Wallula, WA site after the trigger date. This unit was not modified and is not subject to 40 CFR 60.
The TRS concentration must	Various	40 CFR 60.285(d)(1)	Brown Stock Washers No. 1 and No. 2 M&D Digesters	These units were not constructed or modified after September 24, 1976. The No 2 M&D

TOPIC/ PARAMETER	LIMIT & AVERAGE PERIOD	CITATION(S)	SOURCE	REASONING FOR NON- APPLICABILITY
be determined using EPA Method 16 with a sample time of at least 3 hours.			No. 1 and No. 2 Evaporator Sets	digester was constructed prior to September 24, 1976, but was relocated to the Wallula, WA site after the trigger date. This unit was not modified and is not subject to 40 CFR 60.
Oxygen concentrations for correcting TRS emissions must be determined using EPA Method 3B.	Various	40 CFR 60.285(d)(2)	Brown Stock Washers No. 1 and No. 2 M&D Digesters No. 1 and No. 2 Evaporator Sets	These units were not constructed or modified after September 24, 1976. The No 2 M&D digester was constructed prior to September 24, 1976, but was relocated to the Wallula, WA site after the trigger date. This unit was not modified and is not subject to 40 CFR 60.

APPENDIX C

Algorithms for Emissions Calculations

These following algorithms set forth the calculation method for those emission limits that the designated Reference Method itself does not yield a direct emission measurement. The Permittee may use an equivalent method with written approval from Ecology.

A. Reference Method Dependent Emission Limits

Conditions I.A.2 and II.A.2, II.B.2, I.C.2 and II.C.2, I.D.2 and II.D.2, and I.F.2 and II.F.2.

$$\text{PM (mass per time)} = \text{Concentration} * \text{Air Flow Rate} * \text{Unit Conversion Factor} * \text{Time Adjustment}$$

Where,

Concentration is Reference Method (RM) dependent. For example, RM 5 yields particulate emission in terms of grains per dry standard cubic foot (gr/dscf).

Air Flow Rate must be representative of normal operations and is derived from the applicable RM in terms of dry standard cubic feet per minute.

Unit Conversion Factor is case specific. For example, 1 pound = 7,000 grains

Time Adjustment is case specific and is dependent on the flow rate time unit.

This value will then be averaged with the preceding year of the applicable calculated PM emission rates (monthly, quarterly, or other test frequency, whichever applicable) to determine the rolling annual average.

Conditions I.A.5 and II.A.5, I.C.6 and II.C.6

$$\text{SO}_2 \text{ (mass per time)} = \text{Concentration} * \text{Air Flow Rate} * \text{Unit Conversion Factor} * \text{Time Adjustment}$$

Where,

Concentration is case specific in terms of averaging period as required by the permit.

Air Flow Rate must be representative of normal operations and is in the unit of dry standard in cubic feet per minute during the applicable source test period.

Unit Conversion Factor is case specific. For example, the density of SO₂, 0.166 lb per cubic foot of SO₂ based on a molecular weight of 64 lb/lb.mol and an ideal gas volume of standard conditions of 385ft³/lb.mol.

Time Adjustment is case specific and is dependent on the flow rate time unit.

This value will then be averaged with the preceding year of the applicable calculated SO₂ emission rates (monthly, quarterly, or other test frequency, whichever applicable) to determine the rolling annual average.

Conditions II.B.14

$$\text{VOC (mass per time)} = \text{Concentration} * \text{Annual Heat Input} * \text{Unit Conversion Factor}$$

Where,

Concentration is Reference Method dependent. For example, RM 25A yields VOC emission in terms of lb/MMBtu.

Annual Heat Input is the Btu input to the No. 3 Recovery Furnace.

Unit Conversion Factor is case specific. For example, 1 ton = 2000 lb.

B. CEM Dependent Emission Limits

Condition II.B.8

$$\text{SO}_2 \text{ (mass per time)} = \text{Concentration} * \text{Air Flow Rate} * \text{Unit Conversion Factor} * \text{Time Adjustment}$$

Where,

Concentration is case specific in terms of averaging period as required by the permit. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on the No.2 Recovery Furnace derives an hourly averages. The monthly average will be calculated based on the sum of valid individual hourly averages divided by the total number of valid hour averages available.

Air Flow Rate must be representative of normal operation. For example, dry standard cubic feet per minute is obtained from during the most recent particulate matter (PM) sampling period.

Unit Conversion Factor is pollutant specific and involves molar mass and molar volume. For example, the unit conversion factor for SO₂ is 64 lb/lb.mole and an ideal gas of volume at standard conditions of 385 cubic feet.

Time Adjustment is case specific and is dependent on the flow rate time unit.

The monthly values for the year will be summed to determined the annual average at the end of the calendar year.

Condition II.B.10

$$\text{NO}_x \text{ (mass per time)} = \text{Concentration} * \text{Air Flow Rate} * \text{Unit Conversion Factor} * \text{Time Adjustment}$$

Where,

Concentration is case specific in terms of averaging period as required by the permit. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on the No.2 Recovery Furnace derives an hourly averages. The monthly average will be calculated based on the sum of valid individual hourly averages divided by the total number of valid hour averages available.

Air Flow Rate must be representative of normal operation. For example, dry standard cubic feet per minute is obtained from during the most recent PM sampling period.

Unit Conversion Factor is pollutant specific and involves molar mass and molar volume. For example, the unit conversion factor for nitrogen oxide is 0.1194 lb NO_x per cubic foot of NO_x.

Time Adjustment is case specific and is dependent on the flow rate time unit.

The monthly values for the year will be summed to determined the annual average at the end of the calendar year.

Condition II.B.12

$$\text{CO (mass per time)} = \text{Concentration} * \text{Air Flow Rate} * \text{Unit Conversion Factor} * \text{Time Adjustment}$$

Where,

Concentration is case specific in terms of averaging period as required by the permit. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on the No.2 Recovery Furnace derives an hourly averages. The monthly average will be calculated based on the sum of valid individual hourly averages divided by the total number of valid hour averages available.

Air Flow Rate must be representative of normal operation. For example, dry standard cubic feet per minute is obtained from during the most recent PM sampling period.

Unit Conversion Factor is pollutant specific and involves molar mass and molar volume. For example, the unit conversion factor for carbon monoxide is 0.0728 lb CO per cubic foot of CO based on a molecular weight of 28 lb/lb mol and an ideal gas volume of standard conditions of 385ft³/lb mol.

Time Adjustment is case specific and is dependent on the flow rate time unit.

The monthly values for the year will be summed to determined the annual average at the end of the calendar year.

Condition II.B.16

TRS (mass per time) = Concentration * Air Flow Rate * Unit Conversion Factor * Time Adjustment

Where,

Concentration is case specific in terms of averaging period as required by the permit. Each emission unit limitation specifies the averaging period used by the CEM. For example, the CEM on the No.2 Recovery Furnace derives an hourly averages. The monthly average will be calculated based on the sum of valid individual hourly averages divided by the total number of valid hour averages available.

Air Flow Rate must be representative of normal operation. For example, dry standard cubic feet per minute is obtained from during the most recent PM sampling period.

Unit Conversion Factor is pollutant specific and involves molar mass and molar volume. For example, the unit conversion factor for TRS as H₂S is 0.0883 lb per cubic foot based on a molecular weight of 34 lb/lb mol and an ideal gas volume of standard conditions of 385ft³/lb mol.

Time Adjustment is case specific and is dependent on the flow rate time unit.

The monthly values for the year will be summed to determined the annual average at the end of the calendar year.

APPENDIX D

Glossary of Terms Used in the Air Operating Permit

Annual average. In defining the averaging period of a particular limit, annual average means the calendar year average. Determining compliance with a limit with an annual average shall be based on the unit's operation for a calendar year.

Calendar year average. The calendar year average is the average value of a given parameter over the period beginning on January 1 and ending on December 31.

Corrective Action. Action taken by permittee with the intent of removing the identified deviation.

Intermittent compliance. For the purpose of annually certifying compliance, the permittee is considered to be in intermittent compliance with a permit term or condition if it is not in continuous compliance with the permit term or condition during the annual certification period.

Operating/in operation. In operation means engaged in activity related to the primary design function of the source. For example, a straight recovery furnace is in operation only when combusting black liquor, and a lime kiln is in operation only when feeding lime mud.

Rolling Annual Average. In defining the averaging period of a particulate emissions limit, the rolling annual average means the average of the emissions readings of the previous year leading up to the reporting date. For a rolling annual average limit with an associated monthly reporting requirement the rolling annual average is a 12-month rolling average, calculated monthly. The need for this term is necessitated by the possibility of different reporting frequencies for a single emissions limit, based on the performance of the unit compared to the permit limit.

60-minute period. The period from the top of one hour to the top of the next hour (e.g., 07:00:00 to 07:59:59).

Visual opacity assessment. A visual opacity assessment as used in this permit, is the use of an observer trained in general procedures for determining visible emissions, which could include DOE Method 9B or EPA Method 9. A trained observer does not need to have current certification in Method 9B. Under normal conditions a trained observer will be present at the facility, while a certified Method 9B observer is not always readily available.

APPENDIX E

Applicable Requirements Consolidated to Single Permit Terms

Certain permit conditions impose a single emission limit or requirement that is based on two or more underlying applicable requirements. This table presents the basis for consolidating these redundant requirements into single permit conditions.

A. No. 2 Recovery Furnace

Limit #	Underlying Applicable Requirements -- Cite and Paraphrase of Requirement	Basis for Consolidating
I.A.1 & II.A.1	Order DE 96-AQ-I078: particulate limit of 0.044 gr./dscf @ 8% O2 on an hourly average. WAC 173-405-040(1)(a): particulate emissions shall not exceed 0.1 gr./dscf @ 8% O2 averaged over three one-hour tests.	The permit uses the order limit because it is more stringent than the WAC limit.

B. No. 3 Recovery Furnace

Limit #	Underlying Applicable Requirements -- Cite and Paraphrase of Requirement	Basis for Consolidating
II.B.1	Order DE 96-AQ-I078: particulate limits of 0.027 gr./dscf @ 8% O2 averaged over three one-hour tests. WAC 173-405-040(1)(a): particulate emissions shall not exceed 0.1 gr./dscf @ 8% O2 averaged over three one-hour tests.	The permit uses the order limit because it is more stringent than the WAC limit.
II.B.3	Order DE 96-AQ-I078: opacity limit of 20% for 6 consecutive minutes in any 60-minute period when firing fuel oil. WAC 173-405-040(6): no plume from a recovery furnace with an average opacity greater than 35% for more than 6 consecutive minutes in any 60-minute period.	The permit uses the order limit because it is more stringent than the WAC limit.
II.B.13	Order DE 96-AQ-I078: TRS limit of 5 ppmvd @ 8% O2 averaged on a 12-hour basis. WAC 173-405-040(1)(c): TRS emissions shall not exceed 5 ppm @ 8% O2 on a daily averages; DOE Method 12.	The permit uses the order limit because it is more stringent than the WAC limit.

C. Lime Kiln

Limit #	Underlying Applicable Requirements -- Cite and Paraphrase of Requirement	Basis for Consolidating
I.C.1 & II.C.1	Order DE 96-AQ-I078: particulate limits of 0.12 gr./dscf @ 10% O2 when firing fuel oil and 0.067 gr./dscf @ 10% O2 when firing natural gas; hourly average. WAC 173-405-040(3)(a): particulate emissions shall not exceed 0.13 gr./dscf @ 10% O2. 40 CFR 60.282(a)(3)(ii): particulate emissions shall not exceed 0.13 gr./dscf @ 10% O2 when firing fuel oil.	The permit uses the order limit because it is more stringent than the WAC and NSPS limits.

I.C.7 & II.C.7	Order DE 96-AQ-1078 and 40 CFR 60.283(a)(5) : TRS limit of 8 ppmvd @ 10% O2 averaged on a 12-hour basis. WAC 173-405-040(3)(c) : TRS emissions shall not exceed 20 ppmvd @ 10% O2 on a daily average.	The permit uses the order/NSPS limit because it is more stringent than the WAC limit.
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D. No. 2 Smelt Dissolver Tank

Limit #	Underlying Applicable Requirements -- Cite and Paraphrase of Requirement	Basis for Consolidating
I.D.1 & II.D.1	Order DE 96-AQ-1078 and 40 CFR 60.282(a)(2) : particulate limit of 0.2 lb particulate per ton of black liquor solids averaged hourly. WAC 173-405-040(2) : particulate emissions from smelt dissolver tank vents shall not exceed 0.30 lb per ton of solids fired at associated recovery furnace.	The permit uses the order/NSPS limit because it is more stringent than the WAC limit.

E. Hog Fuel Boiler

Limit #	Underlying Applicable Requirements -- Cite and Paraphrase of Requirement	Basis for Consolidating
I.F.1 & II.F.1	Order DE 96-AQ-1078 : particulate limit of 0.04 gr./dscf @ 12% CO2 averaged over three 1-hour tests. WAC 173-405-040(5)(a) : particulate emissions shall not exceed 0.2 gr./dscf @ 7% O2.	The permit uses the order limit because it is more stringent than the WAC limit.

APPENDIX F. Existing Orders and Permits

All of the following past permits and regulatory orders are applicable. (Included)

Order DE 96-AQ-I078

PSD-X-77-04

PSD-95-04

All of the following past permits and regulatory orders are inapplicable. (Not Included)

Regulatory Order 36-8

DE 78-112

DE 78-120

DE 88-112

DE 92-AQI045

DE 95-AQI053 Amendment 1

DE 95AQI055

DE 95AQI084 Modification 1

DE 96-AQI013